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Before the  
FCC MAIL ROOM Federal Communications Commission  
Washington, DC 20554

In the Matter of:

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May 2, 1995

Amendment of Part 97 submitted by Frederick O. Maia )  
requesting the elimination of the provisions which ) RM-8626  
permit the transmission one-way information bulletins )  
and international Morse Code practice below 30 MHz )

These comments are submitted by Kenneth A. Piletic, holder of an Amateur Extra Class license, having operated on frequencies below 30 MHz for the past 42 years under the callsign W9ZMR.

Mr. Maia's request is based on several false beliefs. He contends that HF Bulletins and Code Practice have outlived their usefulness. This is simply not true. A large number of United States Radio Amateurs do not live in areas that are served by VHF and UHF bulletin stations. A bulletin station such as W1AW can be heard throughout the United States without the aid of "relay" stations. HF Receivers are still very popular and most licensed Amateur Radio Operators own at least one HF receiver capable of receiving W1AW bulletins and code practice with a simple antenna system.

Many Amateur Radio Operators also own VHF and UHF receivers (scanners) but cannot use them to receive distant stations without elaborate antenna systems, and such reception is usually limited to less than 100 miles. Even if there were stations transmitting bulletins above 30 MHz on a regular basis, it is unlikely that receivers at any distance would be able to hear them.

It is obvious that HF Bulletins have not outlived their usefulness.

Mr. Maia contends, "... anger is primarily caused when one-way, broadcast type transmissions interrupt two-way communications that are already in progress." This is only partially true. The schedules for Bulletins Transmissions are published well in advance and are regular, i.e., they are not "random" transmissions. Radio Amateurs who are engaged in Two-Way transmissions on a frequency that will be soon used for bulletin transmissions are well aware of the fact, and generally either end their transmissions or change to another frequency before the bulletin transmission begins.

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Unfortunately, there are always a few persons who will defy established procedures and deliberately begin their QSO on a bulletin frequency just before the scheduled time so they can claim they were there first. This is the cause of the anger, not the bulletin transmission itself. Mr. Maia is "especially concerned about the impact of this anger...". Eliminating the bulletins will not change the basic belief of persons who go out of their way to stir up trouble.

Mr. Maia states that services such as "... vhf packet networks, (and) on-line computer services" can be used for for information dissemination, and that the computer can be used for code practice. Again, this is only partially true. While many hams own computers, most do not. Among those who own computers, not all are active on VHF packet or on-line services (such as CompuServe, America On Line, or Prodigy), and fewer still are active on the World-Wide Web pages of the Internet.

Computer-Generated Morse Code is not the same as copying off the air. As sophisticated as computers have become, they cannot simulate the varying conditions that one hears on HF. Persons who have studied code generated by computers and tapes generally must supplement their study with on-the-air copy simply because of the difference in the sound. Also, computers do not provide training in the techniques required to properly tune-in a CW signal.

Another type of "bulletin" is the real-time re-transmissions on HF of the United States Astronauts from the Space Shuttle. This service provides the nation with first-hand knowledge of the Space Program, and offers an outlet for this information to persons who are interested in Space at no cost to the government. Mr. Maia's proposal would eliminate this service.

There are HF Bulletin services that do more than provide information. By carefully choosing bands, times, and modes of transmission, these services can be used to study propagation, mode efficiency, audio clarity/quality, and so forth and disseminate information all at the same time.

RM-8626 would create the need for additional RM's to clarify "what is legal and what is not". One case that comes to mind is the forwarding of HF Packet bulletins. One school of thought says it would be okay, another school of thought says no. This is only one example of the "anger" that will be created if RM-8626 becomes law.

Mr. Maia lists a number of Amateur activities that are incompatible with one-way bulletins. Among those he listed are: DX, Rag Chewing, and Networks. He is correct. This is one reason that Bulletin Stations publish their schedules for the bulletin transmissions in advance. Mr. Maia's proposal would lead one to believe that the bulletins are transmitted continuously. This is not the case. The frequencies used for bulletins are available for use by other Amateur Radio Operators most of the time.

There is still a need for one-way HF bulletin transmissions. They have not "outlived their usefulness", and the perceived "intrusion" is minimal. I respectfully request that the Commission dismiss RM-8626 as being without merit.

Respectfully Submitted

May 2, 1995



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Copies of these comments have been sent to:

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